

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

STIPULATION

Plaintiffs/Counterclaim Defendants Fossa Ltd., IcelandicPLUS, LLC, and Steven Barlow (“Plaintiffs”), Defendants/Counterclaim Plaintiffs I Jian Lin and Encompass Communications, Inc. (“Defendants”), and Counterclaim Defendants Valentin Gurvits, Boston Law Group, LLC, and Sonya Livshits hereby stipulate and agree as follows:

1. Plaintiffs shall have until November 20, 2017 to file an Amended Complaint, which shall not include any causes of action under the Racketeer Influenced and Corrupt Organizations Act;

2. Defendants shall have until December 20, 2017 to file an Answer to Plaintiffs' Amended Complaint and an Amended Counterclaim; and

3. Unless Plaintiffs' Amended Complaint or Defendants' Amended Counterclaim provides an appropriate basis for the Court's continued exercise of federal question jurisdiction, this action shall be remanded to the Superior Court promptly after the Defendants file their Second Amended Counterclaim.

Respectfully submitted,

FOSSA LTD., ICELANDICPLUS, LLC,
and STEVEN BARLOW

/s/ Thomas M. Ciampa

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Respectfully submitted,

I JIAN LIN and ENCOMPASS
COMMUNICATIONS, INC.

/s/ Daniel Murphy

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VALENTIN DAVID GURVITZ, ESQ.,
BOSTON LAW GROUP, P.C., and
SONYA LIVSHITS

/s/ Evan Fray-Witzer

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Dated: October 27, 2017

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on October 27, 2016.

/s/ Daniel J. Murphy